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December 3, 2012

The Honorable Joe McDermott
Chairman, King County Board of Health
King County Courthouse
516 Third Ave, Suite 1200
Seattle, WA 98104

Dear Chairman McDermott,

The Metropolitan King County Board of Health is considering a drug take program which they will then recommend be approved as policy by the full King County Council. The Board of Health deems it necessary to institute this program based on environmental and public safety concerns. The Consumer Healthcare Products Association (CHPA), a trade organization representing the manufacturers and distributors of over-the-counter (OTCs) medicine and dietary supplements, respectfully disagrees.

CHPA encourages the Board of Health to consider the success of the pharmaceutical industry's safe disposal initiatives and anti-drug abuse educational and awareness programs. CHPA and its members take the public safety of medicine abuse and the environmental impacts of medicine very seriously. To solve this two-fold problem, first, we spent the last decade developing the most effective, first-of-its-kind anti-abuse campaigns in partnership with the Community Anti-Drug Coalitions, the Partnership for a Drug-Free America, DARE America, and WebMD.

Research from expert anti-drug associations verifies that the most effective method to address medicine abuse safety concerns is parental education and parent-child communication. According to the Partnership for Drugfree.com, teens, who have regular conversations about drugs with their parents, are half as likely to abuse drugs.

Together, CHPA and the Partnership launched a multi-year, social media-based prevention initiative targeting teens who are actively involved in searching online for information on how to abuse the ingredient Dextromethorphan (DXM). Dextromethorphan is a safe and effective ingredient found in many OTC cough and cold products, which was approved by the U.S. Food and Drug Administration in 1954. It has no pain relieving properties, is not addictive, and is the only non-sedating cough medicine approved as an OTC cough suppressant in the U.S. and is safely used by million of Americans every year.

These prevention initiatives effectively target the concerns of DXM abuse raised by the Subcommittee on Secure Medicine Return.

These hard-hitting social media applications on YouTube and Facebook deliver the fact to teens:

**Consumer Healthcare
Products Association**
900 19th Street, NW, Suite 700
Washington, DC 20006
T 202.429.9260 F 202.223.6835
www.chpa-info.org

abusing OTC drugs is extremely dangerous. We encourage you to experience them:
<http://sipitup.me/> and <http://youtu.be/aK5t2DHdgAk>.

Other elements of the campaign include:

- StopMedicineAbuse.org - a parent-oriented website with information on DXM abuse, as well as a teen-oriented site, DXMstories.com, to provide teens with accurate information about this substance abuse issue;
- Educational brochures for parents, *Preventing Teen Cough Medicine Abuse: A Parent's Guide*, in English and Spanish; and

Research also shows that the demographic abusing DXM is prevalently teenagers. To restrict teens from having direct access to DXM, CHPA proactively introduced federal legislation in 2012 prohibiting the sale of Dextromethorphan products to minors. CHPA supported California legislation restricting the sale of DXM to minors that passed in 2011 and similar legislation in New Jersey and New York.

CHPA works to impact medicine abuse on the local level by hosting Medicine Abuse Town Halls in communities across the country. These have been extremely successful events bringing together elected officials, parents, teachers, school administration, and expert anti-drug coalitions to educate parents and concerned consumers about the signs of teen medicine abuse and the most effective prevention tools and to provide resources and materials to communities to implement their own community or school programs. CHPA would be more than happy to work with the King County Council to co-host a Town Hall in the county.

For other medicines with a tendency to be abused, including Pseudoephedrine (PSE), CHPA and its members advocate for, and fund, the NPLEx system. CHPA has successfully advocated for the passage of NPLEx in 24 states to ensure that those buying PSE are not diverting it to illegal activities. Not only does the NPLEx system stop, in real-time, the illegal sale of PSE, but it also shares that information with law enforcement in real-time and free of charge. CHPA advocated for the passage of NPLEx in Washington and it was passed in 2010 as the 13th state to adopt this important and effective tool to prevent the illegal diversion of OTC medicine.

CHPA is dedicated to ensuring that parents are aware of the instant prevention tools that start right at home, including simple steps such as safely and responsibly storing medicine. CHPA and the U.S. Centers for Disease Control and Prevention launched an educational program focused on safe medicine storage called “Up and Away and Out of Sight.” This program directly targets issues raised by the King County Board of Health concerning teens’ access to medicines through their parent’s medicine cabinet. The campaign is specifically designed to educate and arm parents and caregivers with information about safely storing medicine in the home to prevent accidental ingestion and the importance of being aware of all the quantities of medicines in the home at all times to ensure they are being taken only as directed.

Secondly, in an effort to combat unnecessary negative environmental impacts, CHPA supports SMARxT DISPOSAL, which is a community-focused outreach program recommending that consumers put unwanted medications into a sealable plastic bag, add kitty litter, sawdust, or coffee grounds to the bag, crush any pills in the bag, or add water to dissolve, before placing the sealed bag into the household trash (www.smarxtdisposal.net).

The FDA's National Prescription Drug Take Back Days occur quarterly throughout the United States and provide the most convenient, effective, and environmentally responsible options for medicine disposal without the creation of new, unnecessary infrastructure or risk unintended consequences to consumers, including a likely increase in the cost of medicines.

Lastly, OTCs play a unique role in the lives of consumers. According to the study "The Value of OTC Medicine in the United States," (OTC Value Study) an estimated 240 million consumers rely on OTCs. These consumers specifically want to keep their OTC medicines on hand because they cure reoccurring ailments such as colds, coughs, allergies, headaches, etc., which catch us all by surprise throughout the year. Families especially want to have the medicine they trust on hand when their children become sick in the middle of the night. Additionally, consumers are not going to throw away perfectly good product for financial reason. For every dollar spent on OTC medicines, the U.S. healthcare system saves \$6 to \$7 – providing \$102 billion in value each year, according to the OTC Value Study. The study also found that by keeping the American workforce healthy and at work, OTC medicines offer \$23 billion in potential additional productivity benefits from doctor's office visits avoided and time not having to be away from work for medical appointments. For these reasons, the volume of OTC medicines returned via a drug take back program will be significantly small.

We urge you to consider the benefits of existing programs and our efforts in the community for preventing medicine abuse and educating the public about safe disposal and oppose this ordinance.

I am more than happy to speak to you about this issue at greater length and detail. Please feel free to contact me directly at your convenience. Thank you for your time and your service to the citizens of King County.

Sincerely,



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cc:
King County Board of Health
Councilmember Kathy Lambert
Councilmember Julie Patterson
Councilmember Reagan Dunn
Ray "Bud" Nicola, MD
David Fleming, MD
Mayor David Baker
Councilmember Richard Conlin